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July 24, 2020

By ECF and email

The Honorable Katherine Polk Failla
United States District Judge
United States District Court
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

**Re: *U.S. v. Gregoris Martinez*, 19 CR 690-KPF
Consent Motion to Modify Bail Conditions**

Your Honor:

I represent Gregoris Martinez. I am writing to request a change in Mr. Martinez's bail condition from home incarceration to a curfew, with the hours to be set by Pretrial Services. Mr. Martinez has been compliant with the terms of his pretrial release and excelled in the Focus Forward Program, for which he was chosen as the graduation speaker after completing a 12-week course.

Both the government, by Assistant United States Attorney Aline Flodr, and Pretrial Services, by Joshua Rothman, consent to this application.

Accordingly, I request that the Court approve a modification of Mr. Martinez's conditions of pretrial release from home incarceration to a curfew with hours to be set by Pretrial Services. Thank you for your attention.

Respectfully,



Zachary S. Taylor

cc: Aline Flodr, Esq. (*by ECF and email*)
Joshua Rothman (*by email*)

Application GRANTED.

Dated: July 24, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE